

RESPONSE: This action should be tried by jury in order to protect the rights of these Defendants.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: None of these Defendants are publicly owned corporations.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: These Defendants are informed and believe that the appropriate division for this case is the Columbia Division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: These Defendants are unaware of any such civil or criminal matters related to this lawsuit.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendants Frick and South Carolina Office of the Attorney General are properly identified.

Defendant "Fairfield County Solicitor's Office" is more properly identified as "Solicitor's Office for the Sixth Judicial Circuit." The undersigned counsel would be willing to accept an amended Complaint reflecting the proper name of this Defendant.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: At the present time, these Defendants are not aware of any such individual or entity.

DAVIDSON & LINDEMANN, P.A.

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